

VT EHS FAQ New Requirement to include Hazards on Waste Labels. 9/29/18

A new requirement applies to all waste generators at Virginia Tech. Waste hazards must now be identified on all waste labels during accumulation of wastes in the laboratory or workspace.

One goal of the U.S. Environmental Protection Agency's (EPA's) 2016 [update to the hazardous waste generator regulations](#) was to enhance the safety of facilities that generate hazardous waste and emergency response by improving risk communication. A long-standing, OSHA requirement has been in place for labeling all primary and secondary* containers of hazardous chemicals with both the name of the chemical and the hazards of the chemical. This new EPA requirement applies a similar requirement to all waste containers. *Note: Secondary refers to containers used to hold chemicals transferred from primary containers.

- Virginia Tech EHS has developed a label for use on all chemical waste containers to facilitate identification the waste hazards on waste containers during waste accumulation. All labels are available on the EHS Website.
 - If you use your own waste label or log, the [Small Hazard Label](#) or [Large Hazard Label](#) must be added to your own label upon the first use of the waste container.
 - Alternatively, you may use the [Hazardous Waste Log](#) with the new hazard section already incorporated.
- If a lab has an established alternate workplace label for secondary containers (NFPA, HMIS, etc), these may also be used on waste containers to satisfy the new requirement.
- Hazard labels must also be used with all solid chemical or blue bag lab debris waste containers during accumulation.
- Hazard information has also been added to the EHS Electronic Waste Tickets and should be transferred to the waste submittal information before printing your final waste label.
- Primary chemical containers that are being discarded do not need one of these labels. Just be sure to select the hazard(s) on your electronic ticket submittal to create the waste ticket with hazards you will place on the container.

Hazard Labels

Primary Hazard(s): Please check all that apply to waste added.

Consider hazards of all chemicals/mixtures used or developed.

Flammable **Corrosive (Acid)** **Corrosive (Alkaline)**

Toxic **Carcinogenic** **Oxidizer**

Primary Hazard(s): Please check all that apply to waste added. Consider hazards of all chemicals/mixtures used or developed.

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